

United States District Court  
Southern District of Texas  
FILED

OCT 21 2014

David J. Bradley, Clerk

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF TEXAS  
BROWNSVILLE DIVISION

UNITED STATES OF AMERICA

§

vs

§

CRIMINAL NO.

HUMBERTO REVELES  
MARIA ISABEL LERMA

§

B-14-865

SEALED  
INDICTMENT

THE GRAND JURY CHARGES:

COUNT ONE  
(Mail Fraud Conspiracy)

From in or about October 2013 through in or about September 2014, in the Southern District of Texas and elsewhere and within the jurisdiction of the court, the defendants,

**HUMBERTO REVELES**

and

**MARIA ISABEL LERMA,**

did willfully, that is, with the intent to further the objects of the conspiracy, and knowingly combine, conspire, confederate, and agree with each other and with persons known and unknown to the grand jurors to knowingly and with intent to defraud, devise and intend to devise a scheme and artifice to defraud and to obtain money and property from others by means of materially false and fraudulent pretenses, representations, and promises, and knowingly cause to be delivered certain mail matter by the United States Postal Service and by private and commercial interstate carrier for the purpose of executing the scheme.

**Object of the Conspiracy**

It was the object of the conspiracy for the defendants to obtain money from individuals by selling membership in a non-federally acknowledged Indian tribe, alleging that tribal membership would allow the tribe member to remain in, travel within, and work in the United States solely based on the tribal membership and despite being an alien and lacking legal status, and thus circumvent the immigration laws of the United States.

**Manner and Means of the Conspiracy**

In furtherance of the conspiracy, Defendant Reveles would advertise a way to stop deportations and to allow individuals without legal status to be in the United States to live and work in the United States legally.

Defendants would meet with individuals, either individually or in groups, in their office or in other venues.

Defendants would offer membership in the Yamassee tribe in exchange for money. This membership would allow the prospective tribe members to obtain tribal documentation, which would allow the tribe member to remain in, travel within, and work in the United States solely based on tribal membership.

Defendants would collect money from prospective members and would transmit membership applications and related information by United States Postal Service mailings and by Federal Express deliveries.

Defendants would cause to be delivered by United States Postal Service mailings and Federal Express deliveries identification documents, including tribal

identification cards.

The tribal identification cards bear the words "U.S. Department of State Authentication #04010010-1" or "U.S. Department of State Auth. #04010010-1", which Defendant Reveles would indicate was an acknowledgement of the tribe's status by the U.S. State Department. The authentication number referred to on the cards related to authentication of a State of Georgia document for use abroad, and did not refer to recognition of the Yamassee or any other alleged Indian tribe.

In violation of Title 18, United States Code, Sections 1341 and 1349.

**COUNTS TWO THROUGH FOUR**

(Possession of unlawfully produced document or identification feature that appeared to be issued under the authority of the United States)

On or about the following dates, in the Southern District of Texas and within the jurisdiction of the court, the defendant,

HUMBERTO REVELES,

did knowingly possess an identification document or authentication feature of the United States, to wit: a card bearing State Department Authentication Number #04010010-1, which is stolen or produced without lawful authority, knowing that such identification document or authentication feature was stolen or produced without such authority.

It is further alleged that such identification documents or authentication features were or appeared to be issued by or under the authority of the United States.

<u>Count</u>	<u>Date</u>
Two	April 4, 2014
Three	April 18, 2014

Four

April 24, 2014

In violation of Title 18, United States Code, Sections 1028(a)(6) and 1028(b)(1)(A)(i).

**COUNTS FIVE THROUGH EIGHT**

(Unlawful transfer of a document or authentication feature that appeared to be issued under the authority of the United States)

On or about the following dates, in the Southern District of Texas and within the jurisdiction of the court, the defendant,

**HUMBERTO REVELES,**

did knowingly transfer an identification document or authentication feature of the United States, to wit: a card bearing State Department Authentication Number #04010010-1, knowing that such identification document or authentication feature was stolen or produced without such authority.

It is further alleged that such identification documents or authentication features were or appeared to be issued by or under the authority of the United States.

<u>Count</u>	<u>Date</u>
Five	On or about January 2, 2014
Six	In or about November or December 2013
Seven	In or about January 2014
Eight	In our about February 2014

In violation of Title 18, United States Code, Sections 1028(a)(2) and 1028(b)(1)(A)(i) and 2.

**COUNT NINE**

(Possession with intent to transfer five or more documents)

On or about April 24, 2014, in the Southern District of Texas and within the jurisdiction of the court, the defendants,

**HUMBERTO REVELES**

**and**

**MARIA ISABEL LERMA,**

did knowingly possess with intent to transfer unlawfully five or more false identification documents, authentication features, or identification documents, to wit: identification cards, that appeared to be issued by or under the authority of the United States Government.

In violation of Title 18, United States Code, Sections 1028(a)(3) and 1028(b)(2)(B).

**COUNT TEN**

(Fraud and misuse of visas, permits, and other documents)

From in or about October 2013 through in or about July 2014, in the Southern District of Texas and within the jurisdiction of the court, the defendant,

**HUMBERTO REVELES,**

did knowingly cause to be counterfeited or made immigrant visas, nonimmigrant visas, permits, border crossing cards, alien registration receipt cards, or other documents prescribed by statute or regulation for entry into or as evidence of authorized stay or employment in the United States, that is, tribal identification cards for a tribe not

federally acknowledged.

In violation of Title 18, United States Code, Sections 1546(a) and 2.

**COUNT ELEVEN**  
(Impersonating a diplomat)

On or about April 4, 2014, in the Southern District of Texas and within the jurisdiction of the court, defendant,

**HUMBERTO REVELES,**

did, with the intent to defraud, falsely assume or pretend to be a diplomatic, consular, or other official of a foreign government duly accredited as such to the United States and acts as such, or in such pretended character, demands or obtains or attempts to obtain any money, paper, document, or other thing of value.

In violation of Title 18, United States Code, Section 915.

**COUNT TWELVE**  
(Impersonating a diplomat)

On or about September 7, 2014, in the Southern District of Texas and within the jurisdiction of the court, defendant,

**HUMBERTO REVELES,**

did, with the intent to defraud, falsely assume or pretend to be a diplomatic, consular, or other official of a foreign government duly accredited as such to the United States and acts as such, or in such pretended character, demands or obtains or attempts to obtain any money, paper, document, or other thing of value.


In violation of Title 18, United States Code, Section 915.

A TRUE BILL:

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FOREPERSON OF THE GRAND JURY

KENNETH MAGIDSON  
UNITED STATES ATTORNEY



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JOSEPH T. LEONARD  
Assistant United States Attorney